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2 **FEDERAL DEFENDERS OF SAN DIEGO, INC.**
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5 Attorneys for Mr. Villareal-Ramos

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 **(HONORABLE ROGER T. BENITEZ)**

11 UNITED STATES OF AMERICA,)	Case No. 08CR0095-BEN
)	
12 Plaintiff,)	DATE: February 25, 2008
)	TIME: 2:00 p.m.
13 v.)	
)	NOTICE OF MOTIONS AND MOTIONS:
14 JOSE VILLAREAL-RAMOS,)	
)	(1) TO COMPEL DISCOVERY;
15 Defendant.)	(2) TO DISMISS THE INDICTMENT
)	DUE TO THE MISINSTRUCTION
16)	OF THE GRAND JURY
)	(3) TO GRANT LEAVE TO FILE
17 _____)	FURTHER MOTIONS.

18 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
19 STEWART YOUNG, ASSISTANT UNITED STATES ATTORNEY;
FRED SHEPARD, ASSISTANT UNITED STATES ATTORNEY:

20 PLEASE TAKE NOTICE that on February 25, at 2:00 p.m., or as soon thereafter as counsel
21 may be heard, the defendant, Jose Villareal-Ramos, by and through her counsel, Leila W. Morgan,
22 and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following
23 motions.

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MOTIONS

The defendant, Jose Villareal-Ramos, by and through his attorneys, Leila W. Morgan, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery;
- 2) Dismiss the Indictment Due to Misinstruction of the Grand Jury; and
- 3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

DATED: February 25, 2008

/s/ Leila W. Morgan
LEILA W. MORGAN
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Villareal-Ramos
Leila_Morgan@fd.org

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing motion, is true and accurate to the best of her information and belief, and that a copy of the foregoing has been electronically served this day upon:

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Dated: February 25, 2008

s/ Leila W. Morgan
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